

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

| | | |
|------------------------------|---|--------------------------------------|
| CHRISTOPHER LACCINOLE, | : | CASE NO. 1:21-cv-02321-SO |
| | : | |
| Plaintiff, | : | JUDGE OLIVER |
| | : | |
| v. | : | DEFENDANT NATIONAL ENTERPRISE |
| | : | SYSTEMS, INC.'S UNOPPOSED |
| NATIONAL ENTERPRISE SYSTEMS, | : | MOTION FOR EXTENSION OF TIME |
| INC., | : | TO RESPOND TO PLAINTIFF'S |
| | : | COMPLAINT |
| Defendant. | : | |

Defendant National Enterprise Systems, Inc. (“NES”), by and through undersigned counsel, respectfully moves this Honorable Court for an order granting it a twenty-one (21) day extension of time, up to and including Friday, January 21, 2022, to respond to Plaintiff Christopher Laccinole’s (“Plaintiff”) Complaint. This Motion is not made for any purposes of delay but rather in the interests of justice so NES’ counsel may more fully investigate Plaintiff’s allegations prior to NES’ current deadline to respond on New Year’s Eve. Moreover, the requested extension will not prejudice Plaintiff as Plaintiff’s counsel has consented to and will not oppose this Motion.

Respectfully submitted,

SURDYK, DOWD & TURNER CO., L.P.A.

*/s/*David B. Shaver
Jeffrey C. Turner (0063154)
David B. Shaver (0085101)
8163 Old Yankee Street, Suite C
Dayton, Ohio 45458
(937) 222-2333 | (937) 222-1970 (fax)
jturner@sdtlawyers.com
dshaver@sdtlawyers.com
Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing, along with this Certificate of Service, was filed this 28th day of December, 2021, via the Clerk's CM/ECF system which will provide notice to all counsel of record.

/s/David B. Shaver
David B. Shaver (0085101)